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November 25, 2020

Honorable J.P. Stadtmueller
United States District Court
Eastern District of Wisconsin
517 E. Wisconsin Avenue
Milwaukee, WI 53202

RE: *United States v. Tyshaun Smith*
Case No. 20-cr-93-JPS

Dear Judge Stadtmueller:

On October 22, 2020, the Court issued a Text Order granting the parties' request for additional time. The additional time was necessary to retrieve Mr. Smith's phone from Washington, D.C., allow the parties to meet, unlock it, and continue pending conversations.

The parties appreciate the patience and additional time and have worked towards the goals listed in the filed joint status report, but unfortunately, have not successfully accomplished these tasks. The phone made it back to Milwaukee and the parties were discussing possible times to meet. In the meantime, Mr. Smith's phone was cut off.¹

Under normal circumstances, undersigned counsel would conduct a visit with Mr. Smith to alleviate this issue (as she has in the past). However, given the rise in COVID-19 cases

¹ Unfortunately, Mr. Smith has had financial problems that have led to having his phone cut off on a couple of occasions.

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in Wisconsin, and the fact that she has a vulnerable family member in her home, counsel does feel comfortable taking this approach on this occasion.

It is still Mr. Smith's intention to assist the government to access his phone and to resolve this matter by plea. Under the circumstances, however, the parties respectfully request an additional 30 days to submit a plea agreement in this case.

The parties sincerely appreciate the Court's time and attention to this matter.

Sincerely,

/s/ Gabriela A. Leija

GAL/cm